

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of

Petition for Rulemaking of the Wireless  
Ethernet Compatibility Alliance To Permit  
Unlicensed National Information Infrastructure  
Devices To Operate in the 5.470-5.725 GHz  
Band

RM-10371

To: The Commission

**COMMENTS OF THE  
RESONEXT CORPORATION**

**I. INTRODUCTION**

Resonext™ Communications Inc. hereby submits comments in the above captioned proceeding to encourage the Federal Communications Commission (“Commission” or “FCC”) to approve the Petition to allocate the 5.470-5.725 GHz band for use by radio local area network (“RLAN”) and other unlicensed service devices.

Resonext Communications Inc. is a manufacturer of wireless chipsets, which is sold to customers worldwide. Currently, the company’s product is capable of providing wireless transmissions at data rates of up to 54 Mbps. Provided that the Commission allocates additional spectrum in the 5 GHz band, however, Resonext would be able to increase the data transfer rates of the product to 108 Mbps. The public would benefit from allocation of the additional spectrum because it would be able to utilize more fully the emerging resource intensive multi-media applications, as well as provide higher quality wireless services.

Moreover, if additional spectrum is allocated in the 5.470-5.725 band, Resonext would be able to produce its products for distribution in both the domestic market and the European market without any modifications. Finally, Resonext anticipates that future revisions to its products will allow the transfer data at even higher rates, but only if it is allowed to operate within a bandwidth that is greater than is now available.

We strongly believe action in accordance with the WECA petition would be in the public interest and ask the Commission to allocate the additional spectrum for use by RLAN and other wireless devices.

## **II. DISCUSSION**

### **A. Allocating additional spectrum is in the public interest due to increased competition in the wireless industry domestically and globally**

There is a wealth of information in the world. Access to this information requires a functional broadband infrastructure throughout the country, as envisioned by the Commission and the U.S. Congress. A substantial broadband infrastructure will facilitate new services, stimulate the economy, improve national productivity, improve educational opportunities, and advance economic opportunity for more Americans. The greater competition, and the new services, will benefit the public. The allowance of the proposed spectrum will enable all players to develop products based on a common requirement by U.S. and Europe.

### **B. Resonext's products require additional spectrum**

Our first product, the RN5200 chipset is a full 802.11a compliant chipset for higher data transfer rates. The chipset is now capable of operating at a rate of 54 Mbps, and may provide greater transfer rates in the future, but only if it is allowed to utilize extra amount of spectrum.

**C. Allocating spectrum in the 5.470-5.725 band would allow Resonext to produce Products for multiple markets without modification**

Our first chipset, RN5200 is intended for the domestic market and for the European market. However, the products that are sold in Europe require certain modifications because they will operate in different spectrum bands, including the contemplated 5.470-5.725 GHz band. Thus, if the Commission grants the Petition for Rulemaking and allocates this additional band of spectrum for use by RLAN and other wireless devices, Resonext would be able to manufacture chipsets for both markets without any modifications. This would allow Resonext to be more competitive domestically and internationally.

**D. RN5200 will not cause harmful interference**

The Resonext products adhere strictly to the guidelines of the FCC and IEEE standards and will not cause interference in the 5GHz band

**E. The current rules for the 5.25-5.35 GHz band should be extended to the 5.470-5.725 GHz band.**

It is Resonext's desire to develop Products utilizing the 5.470-5.725GHz band for applications for indoor and outdoor applications

**Conclusion**

For the foregoing reasons, Resonext Communications Inc. respectfully requests the Commission to grant the Petition for Rulemaking and to amend Part 15 of the rules, authorizing the use of the 5.470-5.725 GHz band by U-NII devices. The proposed rules should merely extend the current rules governing the operation of U-NII devices in the 5.25-5.35 GHz band to the newly authorized band.

Respectfully submitted,

RESONEXT COMMUNICATIONS INC.

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